STATE OF ILLINOIS SECRETARY OF STATE SECURITIES DEPARTMENT

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File Number 0900213)))	
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TEMPORARY ORDER OF PROHIBITION

TO RESPONDENT:

Ervin Robinson 644 Phlox Circle

Matteson, IL 60443-1768

Ervin Robinson

7759 S. Eberhart, Suite 100

Chicago, IL 60619

Shirley Robinson 644 Phlox Circle

Matteson, IL 60443-1768

Shirley Robinson

7759 S. Eberhart, Suite 100

Chicago, IL 60619

Vision Financial Partners, LLC

644 Phlox Circle

Matteson, IL 60443-1768

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Vision Financial Partners, LLC 7759 S. Eberhart, Suite 100 Chicago, IL 60619

Vision Trading Partners, LLC 644 Phlox Circle Matteson, IL 60443-1768

Vision Trading Partners, LLC 7759 S. Eberhart, Suite 100 Chicago, IL 60619

On information and belief, I, Jesse White, Secretary of State for the State of Illinois, through my designated representative, who has been fully advised in the premises by the staff of the Securities Department, Office of the Secretary of State, herein find:

- 1. Respondent **Ervin Robinson** is a co-President of Vision Financial Partners, LLC and Vision Trading Partners, LLC and has last known addresses of 7759 S. Eberhart, Suite 100, Chicago, IL 60619 and 644 Phlox Circle, Matteson, IL 60443-1768.
- 2. Respondent **Shirley Robinson** is a co-President of Vision Financial Partners, LLC and Vision Trading Partners, LLC and has last known addresses of 7759 S. Eberhart, Suite 100, Chicago, IL 60619 and 644 Phlox Circle, Matteson, IL 60443-1768.
- 3. Respondent Vision Financial Partners, LLC ("VFP") is a Nevada LLC with its principal place of business being the State of Illinois. VFP was formed on or about January 25, 2007 and is an entity with last known addresses of 7759 S. Eberhart, Suite 100, Chicago, IL 60619 and 644 Phlox Circle, Matteson, IL 60443-1768.
- 4. Respondent **Vision Trading Partners, LLC** is an entity with last known addresses of 7759 S. Eberhart, Suite 100, Chicago, IL 60619 and 644 Phlox Circle, Matteson, IL 60443-1768.

FRAUD IN THE OFFER AND SALE OF SECURITIES

5. Respondent VFP held itself out on its website to be "a long term secure profit investment program, backed up by Real Estate & other assets." In addition, the website stated, "Profits from these assets are used to enhance our program and increase its stability for the long term."

- 6. Starting at least as early as March of 2007, Respondents began to advertise about investments in VFP by circulating flyers to members of various churches.
- 7. One such flyer stated that investors can "Receive interest returns of 18% 22%", have their home mortgages paid off in five to seven years, reduce their monthly mortgage note by half, and can create additional streams of income.
- 8. One of the investments advertised by VFP was an investment scheme that exchanged the equity in an investor's home for a promise to pay off all mortgage liens on an investor's residence in just five to seven years.
- 9. The aforementioned investment scheme worked in the following manner:
 - a. Before or during the offer and sale of the investment contract to an investor, VFP encouraged that investor to take out a home equity mortgage loan on their residence.
 - b. Once the funds from the home equity loan were disbursed to the investor, the investor would then entrust these funds to VFP for their "investment".
 - c. Once VFP received these funds, VFP was to begin paying a certain amount of money toward the investor's mortgage every month until the mortgage was completely paid off in the specified amount of time.
 - d. The investor was also required to make payments to VFP each month representing his or her "share" of the mortgage payment.
- 10. The investment scheme described above constitutes the offer and sale of an investment contract, and thus a security as those terms are defined in Sections 2.1, 2.5, and 2.5a of the Illinois Securities Law of 1953 [815 ILCS 5/1 et. seq.] (the "Act").
- 11. VFP offered and sold these investment contracts to more than one Illinois investor.
- 12. For example, Investor A took out a home equity loan on his residence in the amount of \$123,574.00 and entrusted these funds to VFP after entering into an investment contract with the following terms:
 - a. VFP was to make monthly payments in the amount of \$1,309.27 each month on Investor A's existing mortgages.
 - b. Investor A was to pay VFP \$535.41 a month for his "share" of the monthly mortgage payments.
 - c. Investor A would have his residence free and clear of the two mortgages on his property in five years.

- 13. In the course of the offer and sale of the investment contract to Investor A, Respondents promised Investor A that in the event that VFP was unable to make Investor A's monthly mortgage payments, VFP had an insurance policy that would continue to pay the mortgage, or they would sell properties that they owned to return the full amount of Investor A's investment principal to him.
- 14. VFP also guaranteed investors that they would not lose the principal amount of their investments. As described to potential investors on its website, VFP stated:

In a worst-case scenario, the Company would have assets and chattel, which should theoretically provide enough to return all, of every lender's original principal. But they don't plan to fail! Vision is succeeding quite well and is currently ahead of its obligations to lenders.

- 15. Furthermore, paragraph 12 of VFP's Terms and Conditions Agreement states that "VISION FINANCIAL PARTNERS DOES GUARANTEE RETURN OF INITIAL LOAN."
- 16. Notwithstanding VFP's assurances, VFP only made the promised payments on Investor A's mortgage for about a year and then stopped making them altogether.
- 17. When Investor A called Respondent Ervin Robinson to inquire about the missed payments, Respondent Robinson told Investor A that he "can't do anything about it".
- 18. Despite the Respondents' promises, the Respondents never purchased an insurance policy to protect Investor A from a default on the agreement and never sold any assets to pay back Investor A the principal of his investment.
- 19. Section 12.A of the Act provides that it shall be a violation for any person to offer or sell any security except in accordance with the provisions of the Act.
- 20. Section 12.F of the Act provides that it shall be a violation of the provisions of this Act for any person to engage in any transaction, practice or course of business in connection with the sale or purchase of securities which works or tends to work a fraud or deceit upon the purchaser or seller thereof.
- 21. Section 12.G of the Act provides that it shall be a violation of the provisions of this Act for any person to obtain money or property through

the sale of securities by means of any untrue statement of a material fact or any omission to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

- 22. Section 12.I of the Act provides that it shall be a violation of the provisions of this Act for any person to employ any device, scheme or artifice to defraud in connection with the sale or purchase of any security, directly or indirectly.
- 23. By virtue of the foregoing, Respondents violated Sections 12.A, 12.F, 12.G, and 12.I of the Act.

OFFER AND SALE OF UNREGISTERED SECURITIES

- 24. Section 5 of the Act provides, *inter alia*, that all securities except those exempt under Section 3 or those offered or sold in transactions exempt under Section 4 "shall be registered either by coordination or qualification prior ... to their offer or sale" in the State of Illinois.
- 25. Respondents failed to file with the Secretary of State an application for registration of the securities described above as required by the Act and, as a result, the securities were not registered pursuant to Section 5 of the Act prior to their offer or sale in the State of Illinois.
- 26. Section 12.A of the Act provides that it shall be a violation for any person to offer or sell any security except in accordance with the provisions of the Act.
- 27. Section 12.D of the Act provides, *inter alia*, that it shall be a violation for any person to fail to file with the Secretary of State any application, report or document required to be filed under the provisions of the Act or any rule or regulation made by the Secretary of State pursuant to the Act.
- 28. By virtue of the foregoing, the Respondents violated Sections 12.A and 12.D of the Act.

FAILURE TO COMPLY WITH AN ORDER OF THE SECRETARY OF STATE

- 29. On or about April 24, 2009, The Illinois Securities Department of the Office of the Secretary of State of Illinois ("the Department") opened an investigation of VFP and the investment scheme described above.
- 30. On June 4, 2009, in the course of the investigation into VFP's investment scheme and pursuant to Sections 11.C and 11.D of the Act, the

Department issued separate "11.C" letters to Respondents Ervin and Shirley Robinson requesting specific records and documents of the company. Each 11.C letter stated that "Failure to respond fully and accurately to this request by June 10, 2009... may be treated as a violation of Section 12.D of the Act."

- 31. Respondents Ervin and Shirley Robinson received their respective 11.C letters via certified mail on June 6, 2009.
- 32. As of October 30, 2009, the Respondents have failed and refused to produce the documents requested pursuant to the 11.C letter.
- 33. That the "11.C" letters described above constitute orders of the Secretary of State pursuant to Sections 11.C. and 11.D of the Act.
- 34. Section 12.D of the Act provides, *inter alia*, that it shall be a violation for any person to fail to comply with the terms of any order of the Secretary of State issued pursuant to Section 11 hereof.
- 35. By virtue of the foregoing, Respondents violated Section 12.D of the Act.

PROHIBITION

- 36. Section 11.F(2) of the Act provides, *inter alia*, that the Secretary of State may temporarily prohibit the offer or sale of securities by any person, without notice and prior hearing, if the Secretary of State shall deem it necessary to prevent an imminent violation of the Act or to prevent losses to investors that will occur as a result of prior violations of the Act.
- 37. The entry of this **Temporary Order of Prohibition** prohibiting Respondents, or their agents, affiliates, successors and employees, from offering or selling securities in the State of Illinois is in the public interest and for the protection of the investing public and is consistent with the purposes intended by the provisions of the Act.

NOW THEREFORE IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Section 11.F of the Act, Respondents Ervin Robinson, Shirley Robinson, Vision Financial Partners, LLC, and Vision Trading Partners, LLC and each of Respondents' partners, members, officers and directors, agents, employees, affiliates, successors and assigns, are Temporarily Prohibited from offering or selling securities in or from this State for a maximum period of ninety (90) days.

NOTICE is hereby given that Respondent may request a hearing on this matter by transmitting such request in writing to:

Temporary Order of Prohibition

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James Gleffe
Enforcement Attorney
Illinois Securities Department
Office of the Secretary of State
69 West Washington Street, Suite 1220
Chicago, Illinois 60602

Such request must be made within thirty (30) calendar days of the date of entry of the **Temporary Order of Prohibition.** Upon receipt of a request for hearing, a hearing will be scheduled as soon as reasonably practicable. A request for hearing will not stop the effectiveness of this Temporary Order of Prohibition.

FAILURE OF ANY RESPONDENT TO REQUEST A HEARING WITHIN THIRTY (30) CALANDAR DAYS AFTER ENTRY OF THIS TEMPORARY ORDER OF PROHIBITION SHALL CONSTITUTE AN ADMISSION OF ANY FACTS ALLEGED HEREIN AND SHALL CONSTITUTE SUFFICIENT BASIS TO MAKE THIS TEMPORARY ORDER OF PROHIBITION FINAL.

Dated this 30th day of October 2009.

JESSE WHITE
Secretary of State
State of Illinois

Attorney for the Secretary of State:

James R. Gleffe Enforcement Attorney Illinois Securities Department Office of the Secretary of State 69 West Washington Street, Suite 1220 Chicago, Illinois 60602 312-793-3593